

AO 91 (Rev. 11/11) Criminal Complaint

## UNITED STATES DISTRICT COURT

for the

Southern District of West Virginia

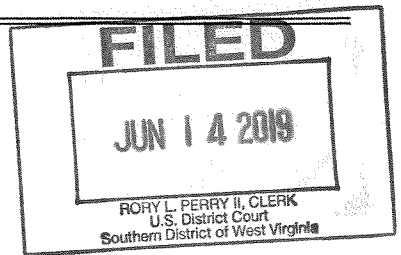
United States of America

v.

Shannon Brown

Case No. 2:19-mj-0060

Defendant(s)



## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 6, 2019 in the county of Kanawha in the  
Southern District of West Virginia, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. Sections 922(g)(1) & 924  
(a)(2)

Convicted felon in possession of a firearm

This criminal complaint is based on these facts:

See attached Affidavit.

☒ Continued on the attached sheet.

  
Complainant's signature

Special Agent David Bullard

Printed name and title

Sworn to before me and signed in my presence.

Date: 06/13/2019City and state: Charleston, West Virginia
  
Judge's signature

Dwane L. Tinsley, U.S. Magistrate Judge

Printed name and title

A F F I D A V I T

STATE OF WEST VIRGINIA

COUNTY OF Kanawha, to-wit:

I, David Bullard, being first duly sworn, do hereby depose and state as follows:

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), and have been a Special Agent with ATF since 2013. As part of my duties with ATF, I have been involved in the investigation of Shannon Brown being a convicted felon in possession of a firearm. This affidavit is based on my review of reports, records, evidence, and conversations with Charleston Police Department Officers who were involved in Brown's arrest.


2. On June 6, 2019, Shannon Brown was a passenger in a vehicle during a traffic stop on Main Street in Charleston. Brown fled from the car and would not listen to police officers' orders to stop. During the chase, Brown ran into a fence and fell to the ground. He got up and after a lengthy foot chase, during which Brown kept reaching under his shirt and he also threw items onto the ground, Detective Rinehart and other officers caught and detained him on Park Avenue in Charleston. Brown was wearing a "belly band" holster, and a loaded Smith & Wesson .40 caliber handgun was recovered along the path where Brown had been running

and right next to where Brown ran into the fence and fell to the ground.

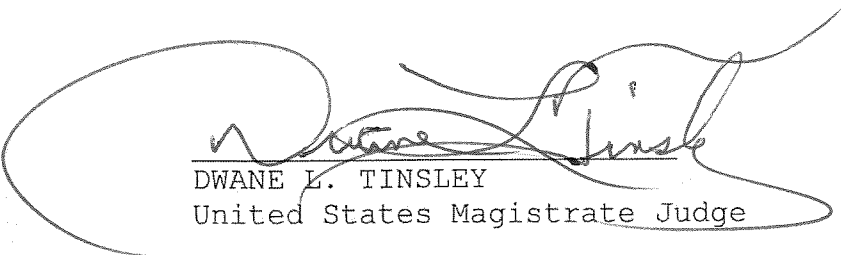
3. Shannon Brown has multiple felony convictions, including a felony conviction in the Circuit Court of Kanawha County, West Virginia, on July 13, 2004 for delivery of cocaine, and felony convictions in the Circuit Court of Kanawha County, West Virginia, on August 12, 1998 for possession with intent to deliver crack cocaine and possession with intent to deliver marijuana.

4. I examined the Smith & Wesson firearm and determined that it functioned as a firearm and was not manufactured in West Virginia.

Further your affiant sayeth naught.

  
DAVID BULLARD, ATF

Sworn to before me, and subscribed in my presence, this  
13th day of June 2019.

  
DWANE L. TINSLEY  
United States Magistrate Judge